

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

4:21-CR-009 (GCH)

**v.
ROBERT T. BROCKMAN**

**STIPULATION TO EXCLUDE TIME
FROM JANUARY 12, 2021 THROUGH
_____ AND**

Defendant.

[PROPOSED] ORDER

It is hereby stipulated by and between counsel for the United States and counsel for the Defendant Robert T. Brockman, that time be excluded under the Speedy Trial Act from January 12, 2021 through the next court appearance.

A status hearing was held on January 12, 2021, and the matter was adjourned until a status conference on a date to be set by the District Court. The government and counsel for Defendant agree that time should be excluded under the Speedy Trial Act because of the complexity of the case, pending motions, and so that defense counsel can continue to prepare for trial, including by reviewing the discovery produced by the government. Accordingly, the parties stipulate and agree to exclude time until the next court appearance, and further stipulate and agree that the ends of justice served by excluding the time from January 12, 2021 through that date from computation under the Speedy Trial Act outweigh the best interests of the public and Defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(1)(D), (h)(7)(A), (h) (7)(B)(ii), (h)(7)(B)(iv).

**STIPULATION TO EXCLUDE TIME
FROM JANUARY 12, 2021 THROUGH
AND [PROPOSED] ORDER**

Page 1

The undersigned certifies that he has obtained approval from counsel for Defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

RYAN K. PATRICK
United States Attorney

s/ Corey J. Smith
COREY J. SMITH
Senior Litigation Counsel
LEE LANGSTON
CHRIS MAGNANI
Trial Attorneys

Attorneys for United States of America

s/ Jason S. Varnado
JASON S. VARNADO
Counsel for Defendant ROBERT T. BROCKMAN

STIPULATION TO EXCLUDE TIME
FROM JANUARY 12, 2021 THROUGH
AND [PROPOSED] ORDER

[PROPOSED] ORDER

Based upon the facts set forth in the stipulation of the parties and the representations made to the Court on January 12, 2021 and for good cause shown, the Court finds that time should be excluded from January 12, 2021 through _____ under the Speedy Trial Act because of the complexity of the case, because of pending motions, and so that defense counsel could continue to prepare, including by reviewing discovery the government has produced, taking into account the exercise of due diligence. 18 U.S.C. §§ 3161(h)(1)(D), (h)(7)(A), (h)(7)(B)(ii), (h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from January 12, 2021 to _____ from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from January 12, 2021 through _____ shall be excluded from computation under the Speedy Trial Act.

IT IS SO ORDERED.

DATED: _____

ANDREW M. EDISON
U.S. Magistrate Judge

STIPULATION TO EXCLUDE TIME
FROM JANUARY 12, 2021 THROUGH
AND [PROPOSED] ORDER